

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In Re: DENISE KOVACH)
) Chapter 7 (13-15340)
Debtor)
) JUDGE: Arthur I. Harris
)
)
)
) **Motion to Approve Agreed Order**
)
)

Debtor Denise Kovach and Creditor David Ayers move this Court to approve an Agreed Order clarifying the discharge injunction in this case.

JURISDICTION

Jurisdiction exists under 11 U.S.C. 727(d). This is a core proceeding under 11 U.S.C. 157(b)(2)(J).

INTRODUCTION

Creditor David Ayers moved this court to reopen this case, which was closed on November 12, 2013. (Doc # 19) A hearing was held on December 9, 2014, wherein this Court granted the motion to reopen for the reasons stated in open court. On December 10, 2014, this Court issued a marginal order reopening the case for the purposes stated in open court. (Doc #25)

During the hearing, this Court stated that it was reopening the case to afford clarification of the discharge injunction as it applies to David Ayers. The Court further stated that it would entertain the parties filing an order consistent with the Court's reasoning.

The parties have been able to reach an agreement on the language of the proposed order as set forth on the attached Exhibit A incorporated herein by reference as if fully restated.

Creditor David Ayers and Debtor Denise Kovach request this Court issue an Order consistent with the proposed order attached hereto.

CONCLUSION

For the reasons set forth above, Creditor David Ayers and Debtor Denise Kovach move this Court to adopt and approve the attached Agreed Order.

Respectfully submitted,

/s/ Russell Ainsworth
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CERTIFICATE OF SERVICE

I, Russell Ainsworth, certify that on February 18, 2015, a true and correct copy of the above motion was served:

Via the court's electronic Case Filing System on these individuals who are listed on the court's electronic Mail Notice List:

Sheldon Stein, Trustee, at ssteindocs@gmail.com, sstein@ecf.epiqsystems.com,
sstein@epiqtrustee.com, Sheldon@steintrustee.com

David M. Leneghan, on behalf of Debtor Denise Kovach, at
leneghalaw@yahoo.com

And by regular U.S. mail, postage prepaid, on:

David Malik, 8437 Mayfield Road, Suite 101, Chesterland, Ohio 44026-2538

Sarah Gedeon, 8437 Mayfield Road, Suite 101, Chesterland, Ohio 44026-2538

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/s/ Russell Ainsworth